



SAPTAGIR CAMPHOR PRIVATE LIMITED

AN ISO 9001:2015 CERTIFIED COMPANY

WHISTLE BLOWER PROCEDURE

1.0 PURPOSE

In recognition of the value that an empowered and informed workforce can offer, SCPL has established these whistle blower procedures (the "Whistle blower Policy") to provide guidance and procedures for the receipt, investigation and retention of reports of suspected violations of laws, rules, regulations, the Code or other **Saptagir Camphor Private Limited (SCPL)** policies, sometimes known as whistle blower complaints

2.0 SCOPE

This procedure reinforces the protections afforded to individuals who come forward, including anonymously, to make reports or voice concerns about violations of the Code, SCPL policy or suspected violations of law or regulations that govern SCPL's operations.

SCPL appreciates that individuals will raise concerns only if they know that doing so will make a difference; therefore, all requests for guidance and reports of misconduct will be treated seriously and SCPL is committed to taking corrective action whenever necessary to ensure the appropriate and timely resolution and remediation of matters.

3.0 Definitions

Whistle blower: A person or entity making a protected disclosure about improper or illegal activities is commonly referred to as a whistle blower. Whistle blowers may be SCPL employees, applicants for employment, vendors, contractors, customers or general public. The whistle blower's role is as a reporting party. They are not, investigators or finders of fact, nor do they determine the appropriate corrective or remedial action that may be warranted

Misconduct / Improper Activities: Examples of misconduct include, but not limited to, fraud, including financial fraud and accounting fraud, violation of laws and regulations, violation of Company policies, unethical behaviour or practices, endangerment to public health or safety and negligence of duty.

Whistle blowers: Whistle blowers should act in good faith and should not make false accusations when reporting of misconduct by the Company's employees.

Suspects: Suspects have a duty to cooperate with investigators. The identity of the suspect shall remain confidential.

Investigators: All investigators derive the authority to handle all matters seriously, confidentially and promptly. All investigators shall be independent and unbiased both in fact and appearance.

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B. Kothapalli, Anantapur-515731,
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Corporate Office:

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Investigation Participants (witness): Employees who are interviewed or asked to provide information have a duty to fully cooperate with the investigators. Participants should refrain from discussing or disclosing matters concerning the investigations.

4.0 PROCEDURE

4.1 Principle of Reporting

If a SCPL employee believes in good faith that a rule or one of the principles laid down in SCPL Code of Conduct and policies has been or is about to be violated, he or she should inform his or her superior or the Compliance Department of his or her concerns regarding possible illegal act or ethical violation.

Any employee, who has any concerns relating to actual or potential illegal or unethical practices in finance, accounting, internal control, free competition or the fight against corruption should report his/her concerns under this policy. When in doubt whether an activity or behaviour is a violation or not, employee should report the same.

Employees, other than executives, that have a concern are encouraged to discuss such matters first with their supervisors, managers or other appropriate personnel such as local Human Resources, or local legal counsel. Concerns relating to the employment terms or matters at the local workplace such as conflicts with colleagues and managers, disciplinary sanctions, correct and timely payment of wages and benefits should normally be resolved locally, unless the matter is exceptionally serious or cannot be reported through the normal reporting line

4.2 What to Report

Below are few examples though non-exhaustive of the areas where non-compliance may be reported:

- Harassment or Discrimination & Workplace Violence
- Protection of Confidential Information and intellectual property
- Improper promotion and improper sales practices
- Conflicts of Interest
- Environmental Health and Safety issues
- Insider Trading
- Anti-competitive behavior
- Theft, misuse of SCPL's assets
- Retaliatory action as mentioned in this policy
- Any Illegal or unethical Practices

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4.3 Channels of raising Concerns

Members of the Board of Directors of SCPL and Management Committee members can report directly, in writing, to the Chairman of the Audit Committee. Employees of SCPL are free to choose the reporting channel for their complaints and can report to the immediate supervisor or any Manager in the line of command or directly to:

- Human Resources
- Head of Department
- SBU/Business Unit Heads
- Site Heads of plants
- Legal Department
- Internal Audit
- SCPL secretary
- Compliance Director
- Chairman Managing Director /MD's
- Management Committee Members

All complaints should be sent to the Compliance Director and/ or SCPL Secretary and under exceptional circumstances an employee can also send complaint, in writing, directly to the Chairman of the Audit Committee on the following

4.4 Reporting Details:

Chairman	Member	Member	Member
Mr. K. V. Ravindra Reddy	Mr. Radha Krishna Gopal Krishna	Mr. M. Ranga Reddy	Mrs. A. Ramadevi

All HR related complaints received should be forwarded to HOD- Human Resources for action. In case, where concern is raised with deliberate and/or ill motive to tarnish the reputation of employee/s and department/s of SCPL, the person raising such concern will undergo the investigation process and disciplinary action.

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4.5 Investigation and Disciplinary Action

Compliance Director will take effective steps to respond to any concern which has been reported. The person raising such concern will also be informed of the outcome of the investigation. In case detailed investigation needs to be conducted, the Audit Committee may direct such investigation to be conducted, if necessary, by an independent external agency. The Compliance Director would be responsible to obtain such internal approvals as may be required. Based on the report of the Investigating Authority or upon his own findings, Compliance Director will recommend disciplinary action in consultation with the Disciplinary Committee. All disciplinary action recommended will be in accordance with applicable laws.

Disciplinary Committee presently comprises of the following members:

- Chairman - Mr. K. V. Ravindra Reddy
- Member - Mr. Radha Krishna Gopal Krishna
- Member - Mr. M. Ranga Reddy
- Member - Mrs. A. Ramadevi

4.6 Management Assurance

Identity of the Complainant

Members of the Board of Directors and employees are encouraged to report the incident by identifying themselves. Such identification helps the investigation process. In case the complainant decides not to disclose his/her identity, an Anonymous report can be submitted. It is the responsibility of each person to report an incident regardless of the choice of disclosing or not disclosing his/ her identity. The identity of the complainant will be kept confidential if asked to do so and will be disclosed only if it becomes necessary for investigation purposes or in certain circumstances where it is legally required to be so disclosed.

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No Retaliation

SCPL assures that there will be no retaliatory action against any person who has reported any incident of non-compliance in good faith, using any appropriate channel of communication as provided for in this policy.

Report to Audit Committee

A quarterly report will be submitted to the Audit Committee by SCPL Secretary on the number of complaints received in the preceding quarter, action taken on the complaints and results of investigations, if carried out.

Retention of Documents

All the documents in relation to concern received and gathered during investigations shall be kept by the Compliance Director for a period of five years.

Amendment

SCPL may amend / modify this policy in whole or part from time to time, with the approval of the Audit Committee.

Approved by

J. Vijaya Kumar
(Director)

Version: March 2020

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WHISTLE BLOWER REPORTING FORM

Please provide the following details for any suspected Misconduct and submit directly to the Whistle blowing Committee (WBC). Please note that you may be called upon to assist in the investigation, if required.

Whistle blower's Contact Information	
Name:	
Contact Number:	Email:
Suspect's Information	
Name:	
Functional Title:	Department:
Contact Number:	Email:
Witness Information (If any)	
Name (1):	
Functional Title:	Department:
Contact Number:	Email:
Name (2):	
Functional Title:	Department:
Contact Number:	Email Address

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Compliant

Briefly describe the Misconduct and how you know about it. Specify what, who, when, where and how. If there is more than one allegation, number each allegation and use as many pages as necessary.

1) What was the Misconduct which had occurred?

2) Who had committed the Misconduct?

3) When did it happen and when did you notice it?

4) Where did it happen?

5) Is there any evidence that you could provide?

6) Are there any other parties involved other than the suspect stated above?

7) Do you have any other details or information which would assist us in the investigation?

8) Any other comments

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Date:	Signature
For Whistle blowing Committee Use	
Complaint No.:	Received By:
Received On:	Acknowledgement Sent On:
Investigation Required (Yes/No)? (If no, please state the reason)	
Investigation To Be Done By:	
Investigation Results:	
Action Taken/Conclusion:	
Signed Off By:	

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